

EXHIBIT K



Deposition of:
Confidential OAO Emily Behar
July 17, 2020

In the Matter of:
**In Re: Capital One Consumer Data
Security Breach L**

Veritext Legal Solutions
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In Re: Capital One Consumer Data Security Breach L

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1 identifying information?

2 A. No.

3 Q. Do you understand what I mean when I use
4 the phrase "personal identifying information"?

5 A. My Social Security number, my name, my --
6 my information. Yeah. Isn't that what it means?

7 Q. Yes, ma'am. That's what I'm referring to.

8 I'm referring to your Social Security
9 number, your name, date of birth, address, that type
10 of information that -- specifically that you
11 provided to Capital One and that was -- that may
12 have been accessed as part of the data breach.

13 That's what I'm referring to. Does that
14 sound okay?

15 A. Have I -- but you're asking me if I ever
16 sold it, and I never sold it.

17 Q. Right. And you've never tried to sell any
18 of that; right?

19 A. No. Correct.

20 Q. Would you ever attempt to sell that type
21 of information if somebody gave you the opportunity?

22 A. No.

23 Q. Do you think you could even sell that type
24 of information?

25 A. I'm sure --

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1 ERRATA for ASSIGNMENT #491051
2 I, the undersigned, do hereby certify that I have
3 read the transcript of my testimony, and that
4 ☒ There are no changes noted.
5 ☐ The following changes are noted:
6
7 Pursuant to Rule 30(f) (e) of the Federal Rules of
8 Civil Procedure and/or OCGA 9-11-30(e), any changes
9 in form or substance which you desire to make to
10 your testimony shall be entered upon the deposition
11 with a statement of the reasons given for making
12 them. To assist you in making any such corrections,
13 please use the form below. If additional pages are
14 necessary, please furnish same and attach.
15 Page _____ Line _____ Change to: _____
16 Reason for change: _____
17 Page _____ Line _____ Change to: _____
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In Re: Capital One Consumer Data Security Breach Litigation

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19 *Emily Behar*
20 DEFONENT'S SIGNATURE
21 Sworn to and subscribed before me this 28 day
22 of August, 2020.
23 _____
24 Notary Public
25 My commission expires _____

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